

**LEILA W. MORGAN**  
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Attorneys for Ms. Salazar-Sandoval

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE MARILYN L. HUFF)

UNITED STATES OF AMERICA,	)	Case No. 08cr0285-H
	)	
Plaintiff,	)	DATE: March 17, 2008
	)	TIME: 2:00 p.m.
v.	)	
	)	NOTICE OF MOTIONS AND MOTIONS:
JOSE ESPINOZA DE LEON,	)	
	)	(1) TO COMPEL DISCOVERY;
Defendant.	)	(2) TO PRESERVE AND REWEIGH
	)	NARCOTICS EVIDENCE; AND
	)	(3) TO GRANT LEAVE TO FILE
	)	FURTHER MOTIONS
	)	
	)	
	)	

TO: KAREN HEWITT, UNITED STATES ATTORNEY; AND  
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 17, at 2:00 p.m., or as soon thereafter as counsel may be heard, the defendant, Esmerelda Salazar-Sandoval, by and through her counsel, Leila W. Morgan, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

**MOTIONS**

The defendant, Esmerelda Salazar-Sandoval, by and through her attorneys, Leila W. Morgan, and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the

1 Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules,  
2 hereby moves this Court for an order to:

- 3 1) Compel discovery;
- 4 2) To Preserve and Reweigh Narcotics Evidence;
- 5 3) Grant leave to file further motions.

6 These motions are based upon the instant motions and notice of motions, the attached  
7 statement of facts and memorandum of points and authorities, and all other materials that may come  
8 to this Court's attention at the time of the hearing on these motions.

9 Respectfully submitted,

10 DATED: March 10, 2008

/s/ Leila W. Morgan  
**LEILA W. MORGAN**  
Federal Defenders of San Diego, Inc.  
Attorneys for Ms. Salazar-Sandoval  
Leila\_Morgan@fd.org

**CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

Rebecca Kanter  
U S Attorneys Office Southern District of California  
Criminal Division  
880 Front Street  
Room 6293  
San Diego, CA 92101  
(619)557-5610  
Fax: (619)235-2757  
Email: Rebecca.Kanter@usdoj.gov

Dated: March 10, 2008

/s/ Leila W. Morgan  
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